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company is guilty of violating the statute. *People v. People's Trust Co.*, 167 N. Y. Supp. 767.

For a discussion of this case, see Notes, page 886.

ATTORNEY AND CLIENT — PRACTICE OF LAW BY CORPORATION — WHAT CONSTITUTES PRACTICE OF LAW — DRAWING OF LEGAL DOCUMENTS. — A statute made it unlawful for a corporation to "render legal services of any kind" or "to furnish attorneys or counsel." [N. Y. PENAL LAW (CONSOL. LAWS, c. 40), § 280.] Defendant corporation drew a bill of sale and chattel mortgage for a customer, charging its regular published rates for such documents. *Held*, that this constitutes a violation of the statute. *People v. Title Guaranty & Trust Co.*, 168 N. Y. Supp. 278.

For a discussion of this case, see Notes, page 886.

CONFLICT OF LAWS — LEGITIMACY — RECOGNITION OF ISSUE OF POLYGAMOUS MARRIAGE. — The minor son of a resident Chinese merchant sought admission into Hawaii. The boy was issue of a marriage contracted in China by the father while he had a lawful wife in Hawaii. The marriage was lawful and the child legitimate in China. Subsequent to the birth of the son the father divorced his Hawaiian wife and cohabited with the Chinese spouse. *Held*, that the boy is not admissible as a legitimate son of his father. *In re Look Wong*, 4 Haw. 568.

The status of a person as legitimate or illegitimate depends on the law of his domicile of origin, which in the principal case was China, where the boy was legitimate. *In re Andros*, 24 Ch. D. 637. Once fixed, the status attends the individual into whatever country he may go. *Smith v. Kelly*, 23 Miss. 167; *Fowler v. Fowler*, 131 N. C. 169, 42 S. E. 563; *Miller v. Miller*, 91 N. Y. 315. It has been held that marriages which are not "Christian," such as polygamous or incestuous unions, will not be recognized. *In re Bethell*, 38 Ch. D. 220; *Hyde v. Hyde*, L. R., 1 P. & D. 130. The better view is that they should be recognized, though the effect usually given the marriage status need not be accorded it. See BEALE, SUMMARY OF CONFLICT OF LAWS, § 47. See also 26 HARV. L. REV. 537. Even though the validity of the marriage is not acknowledged, it does not follow that recognition of the status of legitimacy should be denied. See *Wall v. Williamson*, 8 Ala. 48, 51. *Contra*, *In re Bethell*, 38 Ch. D. 220. See also BEALE, SUMMARY OF CONFLICT OF LAWS, § 60. To so hold would often do violence to the family relationship by suddenly making strangers in law of even the most devoted parents and dutiful children. In a situation like that of the principal case, it might mean an actual separation of father and son. The decision would seem to be both unfortunate and unsound.

CONSTITUTIONAL LAW — DUE PROCESS OF LAW — RIGHT OF LEGISLATURE TO ALTER CHARTER OF PRIVATE CORPORATION. — The legislature, in granting a charter to a railroad corporation, had reserved the right to alter, amend, or repeal the same. The legislature subsequently passed an act requiring the railroad to carry members of the fish and game commission free of charge. *Held*, that this act deprived the railroad company of property without due process of law and was therefore unconstitutional. *Napier v. Delaware, etc. R. Co.*, 102 Atl. 444 (N. J.).

Where no right to alter, amend, or repeal is reserved at the time of the grant, subsequent amendments are unconstitutional unless coming within the police power. *Dartmouth College v. Woodward*, 4 Wheat. (U. S.), 518. Where such right is reserved, the legislature has full power to repeal the charter. *McLaren v. Pennington*, 1 Paige (N. Y.), 102; *Greenwood v. Freight Co.* 105 U. S. 13. See *Ferguson v. Miners', etc. Bank*, 3 Sneed (Tenn.), 609, 628. If the right to repeal is conditional, the legislature is to determine whether the condition is